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January 11, 2021

VIA ECF

Magistrate Steven Tiscione, USMJ

United States District Court

Eastern District of New York

225 Cadman Plaza

Brooklyn, New York 11201

Re: Zapata Osorio, et al. v. Vector Structural Preservation Corp., et al.
Case No.: 19 CV 4896 (LDH)

Dear Magistrate Tiscione:

We represent Defendants Vector Structural Preservation Corp. and Vassilios Handakas in the above matter. This shall serve as Defendants letter motion to advise the court of the status of this matter and to request new dates for certain matters herein.

At present a settlement conference is scheduled for Wednesday, January 13, 2021 and settlement positions are due today. Further, all discovery is due to be completed by March 8, 2021 with dispositive Motion practice due by April 8, 2021. I have conferred with counsel for Plaintiffs on these dates are we hereby jointly advise as follows.

The parties previously conducted a private mediation which was unsuccessful. At this point there has been no change of position by the parties since the mediation and the parties feel that a settlement conference at this juncture would not be fruitful. Accordingly, the parties request that Wednesday's conference be adjourned.

Further, due to the ongoing COVID crisis the parties have had issues obtaining documents and required discovery. Defendant ceased operations for a period of time and Plaintiffs counsel also had issues obtaining requested discovery from their clients.

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At this time, the parties hereby jointly request that the time deadlines be extended for a period of one hundred and twenty (120) days to complete discovery and file dispositive Motions. Also, after discovery is completed a settlement conference can be scheduled.

We thank the court for its consideration herein.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Rabinowitz", is written over the typed name.

Michael M. Rabinowitz

Cc: Counsel for Plaintiff VIA ECF